



June 4, 2014

USNRC Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Stewart L. Magruder, Chief
SMR Licensing Branch 1
Division of Advanced Reactors and Rulemaking
Office of New Reactors

Holtec International
Project Number – PRO0798

Subject: Submittal of Holtec International Comments on Draft Safety Evaluation for Topical Report HI-2135649-NP, Revision 3, “Topical Report on the Quality Assurance Program for Holtec International’s Small Modular Reactor Design Certification”

References: [1] Letter from S. Magruder (US NRC) to M. Beaumont (Holtec International) dated May 15, 2014, “Draft Safety Evaluation for Holtec International Topical Report HI-2135649-NP, Revision 3, “Topical Report on Quality Assurance Program for Holtec International’s Small Modular Reactor Design Certification” (TAC No. RN6122)

Dear Mr. Magruder:

This letter transmits Holtec International’s comments on the Draft Safety Evaluation, transmitted via Reference 1, resulting from the NRC staff’s review of Holtec International Topical Report HI-2135649-NP, “Topical Report on the Quality Assurance Program for Holtec International’s Small Modular Reactor Design Certification, Revision 3”.

Our comments are provided in Enclosure 1 to this letter. If you have any questions, please contact me at 856-797-0900, ext. 3924 (email: m.beaumont@holtec.com).

Sincerely,

Mark Beaumont, Director
Small Modular Reactor Licensing
Holtec International

Cc: Tom Marcille, Holtec International
Mark Soler, Holtec International
Joelle Starefos, US NRC
Stewart Magruder, US NRC

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List of Enclosures:

Enclosure 1: Holtec International Comments on Draft Safety Evaluation for HI-2135649-NP, Revision 3, "Topical Report on the Holtec Quality Assurance Program for Small Modular Reactor Design Certification" (TAC No. RN6122) Project No. 0798

Enclosure 1 to Holtec Letter 2108012

Holtec International Comments on Draft Safety Evaluation for HI-2135649-NP, Revision 3, "Topical Report on the Holtec Quality Assurance Program for Small Modular Reactor Design Certification" (TAC No. RN6122) Project No. 0798

Draft SER Section/Paragraph/ Sentence	Draft SER Proposed Changes	Basis for the Suggested Change
3.1.1 st paragraph/1 st sentence	"Revision 2" should be replaced with " <i>Revision 3</i> ".	Factual error (typographical error).
3.1.2/3 rd paragraph/1 st sentence	Suggest inserting the parenthetical: (<i>where the activity is understood to be a general process such as design</i>) after "... life of the activity"	Clarity concern.
3.1.3/2 nd paragraph/ 2 nd sentence	Delete the word, "plant".	Clarity concern.
3.1.3/3 rd paragraph/2 nd sentence	Suggest inserting: " <i>as necessary</i> " after "... and issuing procedures"	Clarity concern.
3.1.5/1 st paragraph/1 st sentence	Replace "QAM" with " <i>QA program</i> ".	Factual error.
3.1.11/2 nd paragraph/1 st sentence	Suggest inserting, " <i>for computer program testing</i> " after "... test controls"	Clarity concern.
3.1.11/2 nd paragraph/3 rd sentence	Suggest replacing this sentence in its entirety with: " <i>In establishing provisions for testing, the Holtec QATR commits to implementing the quality standards described in NQA-1-2008, Requirement 11. There were no clarifications or exceptions.</i> "	Clarity concern.
3.1.15/1 st paragraph/6 th sentence	Suggest placing a period after "... adequacy", and then begin a new sentence.	Factual error (typographical error).
3.1.15/1 st paragraph/7 th sentence	Suggest replacing "... , and reports provided to designated management." With " <i>... related to nonconforming conditions and performed periodically and reported to management.</i> "	Clarity concern.